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26 CALIFORNIANS FOR  
27 ALTERNATIVES TO TOXICS

28 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO Case No.: 3:24-cv-06632-SI  
TOXICS,

Plaintiff,

**DECLARATION OF MATTHEW LANG**

v.

TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA,

Honorable Susan Illston

Defendants.

I, MATTHEW LANG, declare as follows:

1 I make this declaration based upon personal knowledge, except as to those  
2 matters which are stated otherwise. If called, I could, and would, competently testify as  
3 follows:

4 2. On November 24, 2024, I flew a drone over Defendants' property located at  
5 3243 Spring Hill Road, near Petaluma, California ("Facility"). I was instructed by Plaintiff's  
6 attorneys to collect video and photographs of Defendants' dairy operation, focusing especially  
7 on the holding ponds, the flow of storm water at the site, and the downstream waters.

8 3. I had no intention of capturing any photographs or video of anybody engaging  
9 in personal or private activities.

10 4. The video titled PLF000092, accessible at the following link:  
11 [https://wcarlonlaw-](https://wcarlonlaw-my.sharepoint.com/:v/g/person/william_carlonlaw_com/EcKCyj4Uk4hPgB6aFrPp6EkB-5oMMxdY2iOr4nZMnAvB3w?e=vRKc7g)  
12 [my.sharepoint.com/:v/g/person/william\\_carlonlaw\\_com/EcKCyj4Uk4hPgB6aFrPp6EkB-](https://wcarlonlaw-my.sharepoint.com/:v/g/person/william_carlonlaw_com/EcKCyj4Uk4hPgB6aFrPp6EkB-5oMMxdY2iOr4nZMnAvB3w?e=vRKc7g)  
13 [5oMMxdY2iOr4nZMnAvB3w?e=vRKc7g](https://wcarlonlaw-my.sharepoint.com/:v/g/person/william_carlonlaw_com/EcKCyj4Uk4hPgB6aFrPp6EkB-5oMMxdY2iOr4nZMnAvB3w?e=vRKc7g) shows the conditions at the Facility on the day that  
14 I was there. The following photograph is a still frame of that video, taken at approximately  
15 eight seconds into the video:

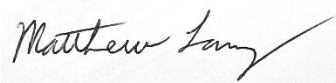


16 The next image is a zoomed in version of the still frame above, focused on one of the berms  
17 located at the bottom center of the photo above:





I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct and that this declaration was executed in Arcata, California on October 10, 2025.

By: 

Matthew Lang